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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIO CESAR GARCIA-CUEVAS,

Defendant.

Case No.: 2:19-cr-00019-MMD-NJK

**Joint Stipulation to Continue
Government's Response to Defendant's
Motion to Dismiss (ECF No. 26), and
Defendant's Reply**

(Second Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and Andrew Wong, Assistant Federal Public Defender, counsel for Julio Cesar Garcia-Cuevas, that the government's response to defendant's motion to dismiss (ECF No. 26) currently due on Tuesday, July 23, 2019, be vacated and continued to July 31, 2019, with defendant's corresponding reply due on August 7, 2019.

This Stipulation is entered into for the following reasons:

1. Government counsel continues to need additional time to properly respond to defendant's motion, to include researching the issues raised by the defendant.

2. Government counsel has requested a copy of records from the defendant's Immigration Court proceeding, and has not yet received these records. These records may be dispositive of the current motion.

3. Denial of this request for continuance could result in a miscarriage of justice.

4. This is the second request for continuance of the government response to defendant's motion to dismiss.

DATED this 22nd day of July, 2019.

RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

By /s/ Andrew Wong

By /s/ Jared L. Grimmer

ANDREW WONG
Assistant Federal Public Defender

JARED L. GRIMMER
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JULIO CESAR GARCIA-CUEVAS,

7 Defendant.
8

Case No.:2:19-cr-00019-MMD-NJK

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10 IT IS THEREFORE ORDERED that the government's response to defendant's
11 motion to dismiss (ECF No. 26) currently due on Tuesday, July 23 2019, be vacated and
12 continued to July 31, 2019, with defendant's corresponding reply due on August 7, 2019.

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14 DATED this 22nd day of July, 2019.

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17 UNITED STATES MAGISTRATE JUDGE
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